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TELE ATLAS N.V. and TELE ATLAS  
NORTH AMERICA

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

\*E-FILED - 1/22/07\*

TELE ATLAS N.V. and TELE ATLAS  
NORTH AMERICA,

Plaintiffs,

v.

NAVTEQ CORPORATION,

Defendant.

) Case No. 05 C 01673 RMW

) **STIPULATION AND []**  
) **ORDER TO MODIFY SCHEDULE**

) Complaint filed April 22, 2005

) The Honorable Ronald M. Whyte

Subject to the approval of this Court, the parties hereby stipulate to the following modification of the schedule entered by this Court on August 17, 2006.

WHEREAS, the parties requested an extension of the discovery cut-off on August 14, 2006 and the Court granted the extension on August 17, 2006;

WHEREAS, the parties have produced a combined total of approximately 1,147,653 pages to date and the parties continue to supplement their productions on a rolling basis;

WHEREAS, the parties have completed eleven days of depositions to date;

WHEREAS, the parties have scheduled an additional seven depositions to take place prior to January 31, 2007;

WHEREAS, the parties intend to take at least an additional fifteen depositions of party witnesses;

WHEREAS, certain witnesses noticed by the parties reside in Europe and Japan and are scheduling travel to the United States to be deposed;

WHEREAS, the parties agree that, in order to complete discovery in this case, an extension of the Court-ordered schedule is required;

THE PARTIES HEREBY STIPULATE that the schedule set forth in this Court's August 17, 2006 Order be modified as follows:

**The current schedule:**

Fact discovery closes January 31, 2007  
Expert discovery closes March 30, 2007  
Dispositive motions due April 16, 2007  
Pre-trial conference on July 10, 2007  
Trial to start the week of July 24, 2007

**The Parties' proposed schedule:**

Fact discovery closes May 1, 2007  
Expert discovery closes July 2, 2007  
Dispositive motions due July 27, 2007  
Pre-trial conference on October 25, 2007  
Trial to start the week of November 5, 2007

1 SO STIPULATED:

2 Dated: December 27, 2006

QUINN EMANUEL URQUHART OLIVER &  
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4 By: /s/ David Eiseman

5 DAVID EISEMAN

Attorneys for Plaintiffs

6 TELE ATLAS N.V. AND TELE ATLAS NORTH  
AMERICA

7 Dated: December 27, 2006

WINSTON & STRAWN LLP

9 By: /s/ David Koropp

10 DAVID KOROPP

Attorneys for Defendant

11 NAVTEQ CORPORATION

12 PURSUANT TO STIPULATION, IT IS SO ORDERED:

14 Dated: 1/22/07

*Ronald M. Whyte*

UNITED STATES DISTRICT COURT JUDGE